



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region Portland Office

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February 16, 2016

Melissa Peterson
Legal Counsel
Sulzer Pumps (US) Inc.
800 Koomey Road
Brookshire, TX 77423

RE: 2800 NW Front Ave - New Accessory Building Stormwater Management
ECSI #1235

Dear Ms. Peterson:

This letter is in response to your February 0, 2016 request to the Oregon Department of Environmental Quality (DEQ) to provide an opinion on whether stormwater management through infiltration is appropriate for the above-referenced property. This determination is required by the City of Portland Bureau of Environmental Services for inclusion with Sulzer's permit application for a proposed new building construction.

The proposed building is located on the southern part of the property near NW Front Avenue (see attached figure). Potential areas identified for stormwater infiltration include just west of the proposed building (one area), along the western property line (two areas), on either end of the existing building to the north (two areas), and in the parking area in the northwest corner of the property (six areas).

The areas deemed acceptable by DEQ for infiltration are indicated with "OK" adjacent to the area, and those deemed unacceptable are indicated with an "X".

Acceptable areas include the area to the west of the proposed building, and the two areas along the western property. This determination is based on the following. Two underground storage tanks (USTs) formerly used for gasoline storage were removed from the south end of the property in 1990 from a location near the proposed infiltration area. To address releases from the USTs a soil removal was completed, and a groundwater recovery well was installed and operated. Monitoring well SB-1, formerly located just northwest of the release area, generally showed non-detect results for gasoline and volatile organic compounds (VOCs). The location of SB-1 appears very close to the southern infiltration area. Based on the remediation and subsequent monitoring completed in this area, DEQ believes that infiltration is acceptable in this area. There is no indication of contaminant releases near the western property boundary, or that contaminated groundwater from other sources has migrated to this area. Thus the two areas along the western property boundary are deemed suitable for infiltration.

There are limited data regarding soil and groundwater quality at and near the proposed infiltration areas on either end of the existing building to the north (two areas), and in the parking area in the northwest corner of the site (six areas). Given the long operational history of the site



it is possible that there are unknown contaminant source areas or localized groundwater contaminant plumes in these areas. Given the proximity to the Willamette River and potential for stormwater infiltration to mobilize groundwater contamination and discharge to the Willamette River, DEQ does not believe these areas are suitable for infiltration.

Should you have any questions please contact me at pugh.mark@deq.state.or.us or 503 229-5587.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Pugh', with a stylized, cursive flourish.

Mark Pugh, R.G.
Project Manager
DEQ Northwest Region Cleanup and Tanks Program

cc via e-mail: Eva Demaria, EPA Region 10 (demaria.eva@epa.gov)
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